

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**FILED**  
**3/28/2024**  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

CASE NUMBER: 24CR162

ABDUL BARR

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about March 25, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*

Title 18, United States Code, Section  
2113(a)

*Offense Description*

by force and violence, and by intimidation, took from the person or presence of a bank employee approximately \$5,078 in United States currency belonging to, and in the care, custody, control, management, and possession of, Fifth Third Bank, located at 820 North Western Avenue in Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

Type text h

X Continued on the attached sheet.

*Scott Potter*

SCOTT POTTER

Special Agent, Federal Bureau of Investigation  
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: March 28, 2024

*Sheila Finnegan*  
Judge's signature

City and state: Chicago, Illinois

SHEILA FINNEGAN, U.S. Magistrate Judge  
Printed name and title

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, SCOTT POTTER, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed for approximately 4 years. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives. I have experience investigating bank robberies.

2. This affidavit is submitted in support of a criminal complaint alleging that ABDUL BARR has violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging BARR with bank robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information that appears in law enforcement records, interviews of witnesses, my review of surveillance videos and images, my training and experience, and the experience of other law enforcement agents.

## **I. FACTS SUPPORTING PROBABLE CAUSE**

### **A. Summary of Probable Cause**

4. In summary, and as described further below, based on surveillance video and images, witness interviews, and law enforcement's investigation, there exists probable cause to believe that on March 25, 2024, ABDUL BARR robbed the Fifth Third Bank located at 820 North Western Avenue, Chicago, Illinois 60622 (the "Western Fifth Third Bank").

5. On March 25, 2024, at approximately 10:07 a.m., an individual later identified as BARR entered the Western Fifth Third Bank, displayed an item resembling a firearm, and demanded employees provide money to him, which they did. BARR escaped with approximately \$5,078 from teller drawers, which he placed in a black backpack. The Western Fifth Third Bank deposits were insured by the Federal Deposit Insurance Corporation at the time of the robbery.

6. BARR fled the bank and returned to his vehicle, which he had parked at a Shell Gas Station across the street, located at 823 North Western Avenue (the "Western Shell"). Law enforcement later located BARR after the Chicago Police Department detained him for a separate robbery. BARR consented to a search of his vehicle, from which law enforcement recovered a toy firearm and a black backpack containing \$1,440. During a recorded interview, BARR identified himself in surveillance footage taken at the Western Shell across the street from the bank shortly before the robbery.

**B. March 25, 2024 Robbery of the Western Fifth Third Bank**

7. According to surveillance footage from the Western Fifth Third Bank and bank employees, at approximately 9:51 a.m. on or about March 25, 2024, an offender entered the bank, subsequently leaving momentarily at approximately 9:52 a.m. At approximately 9:54 a.m., the offender reentered the bank with a backpack he had not had when he entered at approximately 9:51 a.m.

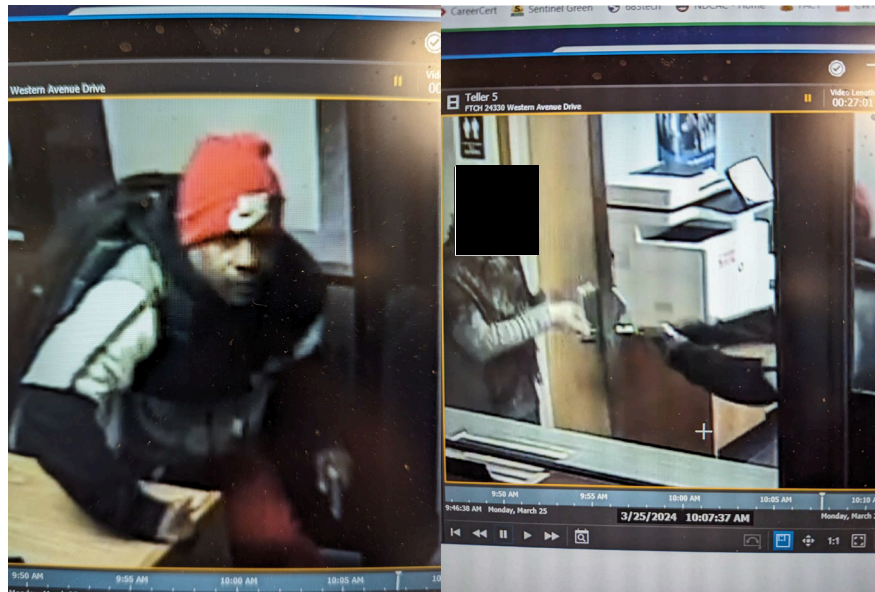
8. According to surveillance footage from the Western Fifth Third Bank, the offender who entered and reentered the bank was an African-American male wearing a red Nike hat, a black and grey sweatshirt, red pants, black and gray shoes, and carrying a black backpack.



(Images of offender entering the Western Fifth Third bank)

9. According to surveillance footage from the Western Fifth Third Bank, upon reentering the bank, the offender sat down at a desk in the lobby and appeared to wait to meet with a bank representative.

10. According to surveillance footage from the Western Fifth Third Bank, at approximately 10:07 a.m., a bank teller opened the locked door separating the teller area from the lobby to assist the offender. At this time, the offender stood up from the desk, displayed what appeared to be a firearm, pointed it at the teller, pushed the teller back into the teller area, and entered the teller area.



(Images of offender standing up from desk and pointing firearm at teller)

11. According to surveillance footage from the Western Fifth Third Bank, the offender removed U.S. currency from two teller drawers before fleeing the bank.

**1. Account of Victim Teller 1**

12. According to Victim Teller 1, Victim Teller 1 was assigned to teller station two at the Western Fifth Third Bank on March 25, 2024, at approximately 9:51 a.m.

13. According to Victim Teller 1, when the offender, later identified as BARR, entered the bank, Victim Teller 1 asked the offender if he needed help. The offender stated that he was interested in opening an account. Victim Teller 1 asked the offender to sit at the customer desk and wait for a personal banker to assist him.

14. According to Victim Teller 1, while the offender was sitting at the customer desk, he appeared to be looking around the bank in a suspicious manner. The offender stood up and walked towards the bank's entrance door, at which point Victim Teller 1 informed the offender that if he was in a hurry, there was another Fifth Third Bank two blocks north. The offender responded that he was interested in an account at the Western Fifth Third Bank.

15. According to Victim Teller 1, the offender exited the Western Fifth Third Bank, walked east, and crossed the street toward the Western Shell. Victim Teller 1 observed the offender until he was out of Victim Teller 1's line of sight.

16. According to Victim Teller 1, a short time later, the offender reentered the Western Fifth Third bank and sat down again at the customer desk.

17. According to Victim Teller 1, at this point, Victim Teller 2 walked towards the lobby area to assist the offender. As Victim Teller 2 opened the door separating the teller workstation from the lobby, the offender displayed what s/he

believed to be a handgun, grabbed Victim Teller 2, and pushed him/her back into the employee area of the Western Fifth Third Bank.

18. According to Victim Teller 1, upon the offender displaying a suspected firearm and realizing that Victim Teller 1 was being robbed, Victim Teller 1 became fearful for his/her safety.

19. According to Victim Teller 1, the offender then approached Victim Teller 1 at his/her teller station with what s/he believed to be a handgun in one hand and a black backpack in the other. The offender demanded that Victim Teller 1 give him money. Victim Teller 1 complied with the offender's demands and observed the offender open his/her teller drawer. The offender removed U.S. currency from the teller drawer.

20. According to Victim Teller 1, the offender placed the money he had taken from Victim Teller 1's teller drawer into the black backpack he was holding. He then approached Victim Teller 2's teller drawer and removed U.S. currency from this teller drawer. The offender placed the money he had taken from Victim Teller 2's teller drawer into the black backpack he was holding.

21. According to Victim Teller 1, he/she observed the offender leave the teller station and run out of the Western Fifth Third Bank. The offender ran east and across Western Avenue, before entering a silver sedan parked at the Western Shell.

22. According to Victim Teller 1, the offender was a black male, approximately 30-35 years old, 5'5" to 5'7" in height, medium build, and wearing red sports pants, a black jacket, and a dark-colored hat.

**2. Account of Victim Teller 2**

23. According to Victim Teller 2, he/she observed the offender reenter the Western Fifth Third Bank after briefly leaving the premises. Shortly after the offender reentered the bank, Victim Teller 2 left his/her counter to enter the lobby area to assist the offender. Upon opening the door between the employee area and the lobby, the offender stood up, displayed what s/he believed to be a handgun that was plain metal or silver steel in color with a red tip, and pointed it at Victim Teller 2. The offender also began to violently open the door that Victim Teller 2 had opened and pushed Victim Teller 2 back into the teller area.

24. According to Victim Teller 2, upon the offender displaying the suspected firearm and realizing that Victim Teller 2 was being robbed, Victim Teller 2 became fearful for his/her safety.

25. According to Victim Teller 2, the offender entered the teller area and went directly to the teller drawers. The offender attempted to open a teller drawer that was locked. He then opened the drawer immediately next to the locked drawer, which was unlocked. The offender removed U.S. currency from the unlocked drawer and proceeded to Victim Teller 2's teller drawer, from which he removed more U.S. currency.





(Offender at Victim Teller 2's teller drawer)

26. According to Victim Teller 2, the offender then fled the Western Fifth Third Bank, running on foot eastbound and across Western Avenue towards the Western Shell. Victim Teller 2 observed the offender enter a silver sedan parked at the Western Shell and took multiple pictures of the silver sedan as the offender fled the scene.



(Teller photos of the silver sedan at and fleeing the Western Shell)

### **3. Law Enforcement Investigation**

#### **a. Western Shell Surveillance Footage**

27. In summary and as described below, on or about March 25, 2024, at approximately 9:48 a.m., approximately 19 minutes prior to the robbery of the Western Fifth Third Bank, an individual was captured on surveillance cameras parking a silver sedan at the Western Shell, entering the Western Shell, and leaving the Shell without purchasing anything.

28. According to surveillance footage from the Western Shell, the individual who entered and reentered the bank was an African-American male wearing a red Nike hat, a black and grey sweatshirt, red pants, and black and gray shoes.



(Image of individual in the Western Shell)

29. According to surveillance footage from the Western Shell, at approximately 9:50 a.m., the individual walked out of the Western Shell and walked across Western Avenue towards the Western Fifth Third Bank. At approximately

9:52 a.m., the individual exited the bank, walked eastbound and across Western Avenue to his parked silver sedan at the Western Shell, retrieved a backpack from the rear passenger seat, and walked back to and reentered the bank.

30. According to surveillance footage from the Western Shell, at approximately 10:08 a.m., the individual ran across Western Avenue from the direction of the Western Fifth Third Bank, to the Western Shell, and entered the same silver sedan before driving away.

31. Upon driving away, Chicago Police Observation Device (“POD”) cameras observed the fleeing silver sedan, displaying an Illinois temporary registration 906-AB-932.

**b. Interview of BARR**

32. On or about March 27, 2024, at approximately 10:20 a.m., the Chicago Police Department (“CPD”) alerted officers of a License Plate Reader (“LPR”) hit for Illinois temporary registration 906-AB-932, a wanted felony vehicle associated with an armed robbery at the Denny’s located at 4824 North River Road, Schiller Park, Illinois 60176 that occurred on or about March 23, 2024, which is under investigation by the Schiller Park Police Department. CPD located the wanted vehicle – a silver sedan matching the description of the vehicle used at the Western Fifth Third Bank robbery – at 2231 South Pulaski Road and detained the driver, who later identified himself as BARR.

33. The Schiller Park Police Department alerted me that BARR was in custody. Members of the FBI Violent Crime and Fugitive Task force (“VCFTF”),

responded to BARR's vehicle held by CPD, took custody of the vehicle, and towed it to the FBI Chicago Field Office.

34. At approximately 12:27 p.m., CPD Task Force Officer ("TFO") Gerald Reilly and I arrived at CPD Area 4 to interview BARR following his detainment by CPD. The interview was audio and video recorded. TFO Reilly read BARR the FBI Advice of Rights form, to which BARR acknowledged his understanding and signed at approximately 12:29 p.m.

35. BARR stated that he could not remember where he was or what he did on March 25, 2024. BARR stated that he was homeless and usually slept in his vehicle, sometimes outside of his aunt's home in Maywood.

36. BARR was shown the image of the individual in the Western Shell above from 9:50 a.m. on or about March 25, 2024. BARR confirmed that the individual in the image was BARR.



(Image of individual in the Western Shell)

37. While speaking with BARR and having knowledge of the offender's attire during the Western Fifth Third Bank robbery, I believed BARR was wearing the same pants and shoes as the offender during the robbery.



(Image of BARR in custody on or about March 27, 2024)

**c. Search of BARR's Silver Impala**

38. On or about March 27, 2024, at approximately 12:38 p.m., BARR gave verbal and written consent for law enforcement to search his silver Impala sedan bearing Illinois temporary registration 906-AB-932 ("BARR's Impala").

39. Members of the VCFTF searched BARR's Impala at the FBI Chicago Field Office.

40. Upon searching BARR's Impala, law enforcement recovered a black backpack from the trunk containing approximately \$1,440 of U.S. currency.





(Images of black backpack and money within recovered from BARR's Impala)

41. Law enforcement also recovered a silver toy firearm with a red tip from the driver's side door pocket.



(Images of silver toy firearm recovered from BARR's Impala)

**d. Identification of BARR as the Offender**

42. In summary, law enforcement has identified the offender as ABDUL BARR based on a comparison of known images of BARR to surveillance footage from the Western Fifth Third Bank and the Western Shell, as well as BARR's admission as being the individual depicted in the Western Shell surveillance footage above.

43. I obtained an Illinois state identification photo for BARR. I compared that photo to images taken of the offender immediately before and during the course of the robbery. I also interviewed BARR on March 27, 2024. Based on my comparison of those images, my face-to-face meeting with BARR, and the facts described above, I identified the offender as BARR.



(Driver's License photo of BARR; individual in Western Shell; offender in Western Fifth Third Bank)

#### **4. Information Received from Fifth Third Bank**

44. According to Fifth Third Bank representatives, an audit conducted on or about March 25, 2024, confirmed that the offender took approximately \$5,078 from the Western Fifth Third Bank. The representatives confirmed that at the time of the March 25, 2024 robbery, the Western Fifth Third Bank's deposits were insured by the Federal Deposit Insurance Corporation.

45. Law enforcement has also obtained a copy of Fifth Third Bank's Federal Deposit Insurance Corporation certificate, which confirms that the Western Fifth Third Bank was insured by the Federal Deposit Insurance Corporation on March 25, 2024.

## II. CONCLUSION

46. Based on the information above, I respectfully submit that there is probable cause to believe that ABDUL BARR robbed the Western Fifth Third Bank on or about March 25, 2024, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

*Scott Potter*

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SCOTT POTTER  
Special Agent, Federal Bureau of  
Investigation

SWORN TO AND AFFIRMED by telephone March 28, 2024.

*Sheila Finnegan*  
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Honorable SHEILA FINNEGAN  
United States Magistrate Judge